

**MAINOR WIRTH, LLP**  
6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148  
Phone: (702) 464-5000 | Fax: (702) 463-4440

BRADLEY S. MAINOR, ESQ.  
Nevada Bar No. 7434  
JOSEPH J. WIRTH, ESQ.  
Nevada Bar No. 10280  
ASH MARIE BLACKBURN, ESQ.  
Nevada Bar No. 14712  
**MAINOR WIRTH, LLP**  
6018 S. Fort Apache Road, Ste. 150  
Las Vegas, NV 89148-5652  
Tel: (702) 464-5000  
Fax: (702) 463-4440  
[ash@mwinjury.com](mailto:ash@mwinjury.com)  
*Counsel for Plaintiff*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

CHRIS MICHAELS, individually; DEIAN  
BORISLAV KOLEV, individually; and  
CHRISTINE LE, individually;

Plaintiff,

vs.

DMITRY PUSTYLNIKOV, individually;  
KNIGHT TRANSPORTATION, INC., a  
Foreign Corporation; DOES I through XX,  
inclusive; and ROE CORPORATIONS I  
through XX, inclusive,

Defendants.

CASE NO: 2:21-cv-00484-JAD-BNW

**STIPULATION AND ORDER TO  
EXTEND JOINT PRETRIAL ORDER  
DEADLINE (SECOND REQUEST)**

Pursuant to LR IA 6-1, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the Joint Pretrial Order deadline in the above-captioned matter. Good cause exists to extend the remaining deadline for the reasons explained below.

**A. Reasons For the Extension**

On September 28, 2022, deciding the matter in chambers, Judge Cristina D. Silva denied a second proposed joint pretrial order without prejudice. In the minute order, Judge Silva indicated that a third proposed joint pretrial order be submitted by October 28, 2022 if the matter did not

1 resolve at mediation. At the time of Judge Silva's decision, the parties were set to mediate on  
2 August 9, 2022. Unfortunately, due to scheduling conflicts, the mediation has been moved to  
3 November 15, 2022. Counsel recently conferred regarding an extension of time to submit the  
4 parties' Joint Pretrial Order in light of the new mediation date. The parties request that the  
5 October 28, 2022 deadline be extended so that the parties are able to provide a proper Joint  
6 Pretrial Order to the Court after participating in mediation.

7 **B. Proposed Revised Pretrial Order Schedule**

8 The Joint Pretrial Order is due on October 28, 2022 and the parties are requesting the  
9 deadline be moved to December 15, 2022. This request for an extension of time is not sought for  
10 any improper purpose or other purpose of delay. Rather, it is sought by the parties solely for the  
11 purpose of conducting mediation on November 15, 2022. The extension of time will allow the  
12 parties to participate in meaningful settlement negotiations through mediation. The parties  
13 reasonably believe that this matter can be resolved through mediation, thus saving the time and  
14 resources of this Court. Accordingly, the parties respectfully submit that the reasons set forth  
15 above constitute compelling reasons and good cause for the short extension.

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WHEREFORE, the parties respectfully request that this Court extend the deadline for submitting their Joint Pretrial Order from the current deadline to December 15, 2022.

DATED this 24th day of October, 2022.

DATED this 24th day of October, 2022.

**MAINOR WIRTH, LLP**

**WOOD, SMITH, HENNING &  
BREMAN, LLP**

/s/ Ash Marie Blackburn  
BRADLEY S. MAINOR, ESQ.  
Nevada Bar No. 7434  
JOSEPH J. WIRTH, ESQ.  
Nevada Bar No. 10280  
ASH MARIE BLACKBURN, ESQ.  
Nevada Bar No. 14712  
6018 S. Fort Apache Road, Ste. 150  
Las Vegas, NV 89148-5652  
*Counsel for Plaintiff*

/s/ Analise N.M. Tilton  
JOEL D. ODOU, ESQ.  
Nevada Bar No. 7468  
ANALISE N. M. TILTON, ESQ.  
Nevada Bar No. 13185  
SUSANA SANTANA, ESQ.  
Nevada Bar No. 13753  
2881 Business Park Court, Ste. 200  
Las Vegas, NV 89128  
*Attorneys for Defendants Dmitry  
Pustynnikov and Knight Transportation, Inc.*

**ORDER**

IT IS SO ORDERED.

DATED this 25th day of October, 2022.

  
UNITED STATES MAGISTRATE JUDGE

**MAINOR WIRTH, LLP**  
6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148  
Phone: (702) 464-5000 | Fax: (702) 463-4440

**From:** Analise N. M. Tilton <atilton@wshblaw.com>  
**Sent:** Monday, October 24, 2022 4:07 PM  
**To:** Tyler Bixby  
**Cc:** Joel D. Odou; Johana Whitbeck; Susana Santana; Natalie Cothran; Ash Blackburn; Ashlee Clark  
**Subject:** RE: Kolev, Michaels and Le - Proposed STIP to Extend Joint Pretrial Order Deadline  
**Attachments:** 2022.10.20 STIP to extend PT Order .doc

Hi Tyler,

You may use my e-sig. Thanks.

**Analise N. M. Tilton**

Partner

**WOOD SMITH HENNING & BERMAN LLP**

A 2881 Business Park Court, Suite 200, Las Vegas, NV 89128-9020

D 702.251.4115 M 702.249.7399

E atilton@wshblaw.com W www.wshblaw.com

[Personal Bio](#) · [Facebook](#) · [LinkedIn](#) · [Twitter](#)

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**From:** Tyler Bixby <[tyler@mwinjury.com](mailto:tyler@mwinjury.com)>  
**Sent:** Friday, October 21, 2022 1:48 PM  
**To:** Joel D. Odou <[jodou@wshblaw.com](mailto:jodou@wshblaw.com)>; Johana Whitbeck <[JWhitbeck@wshblaw.com](mailto:JWhitbeck@wshblaw.com)>; Susana Santana <[SSantana@wshblaw.com](mailto:SSantana@wshblaw.com)>  
**Cc:** Natalie Cothran <[Natalie@mwinjury.com](mailto:Natalie@mwinjury.com)>; Ash Blackburn <[Ash@mwinjury.com](mailto:Ash@mwinjury.com)>; Ashlee Clark <[acClark@mwinjury.com](mailto:acClark@mwinjury.com)>  
**Subject:** [EXTERNAL] Kolev, Michaels and Le - Proposed STIP to Extend Joint Pretrial Order Deadline

Good afternoon counsel,

I have attached a proposed Stip to Extend Joint Pretrial Order Deadline. In light of upcoming mediation, we are requesting the deadline be moved to a month after mediation. Please advise if I may affix your eSignature.

Sincerely,

***Tyler Bixby***

Law Clerk

**MAINOR WIRTH, LLP**

6018 S. Ft. Apache Rd. | Suite 150

Las Vegas, Nevada 89148

Tel: 702.464.5000 | Fax: 702.463.4440

[tyler@mwinjury.com](mailto:tyler@mwinjury.com)

**MAINOR WIRTH**  
ATTORNEYS AT LAW

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